

Nicholas Fitzgerald, Esq. NF/6129
Fitzgerald & Associates, P.C.
649 Newark Avenue
Jersey City, NJ 07306
Email: nickfitz.law@gmail.com
(201) 533-1100
Counsel for Debtor

Attorney for Debtor -- I.D. # NF/6129

United States Bankruptcy Court
District of New Jersey -- Newark
-----X
In re:

Jeanel N. Roman

Chapter 13

Case # 22-14013-RG

Debtor

-----X

**DEBTOR'S COUNSEL'S CERTIFICATION IN OPPOSITION TO MORTGAGEE'S
CERTIFICATION OF DEFAULT**

I, Nicholas Fitzgerald, being of full age and being the above named debtor's counsel, certify under penalty of perjury that:

1. I make this certification in opposition to the debtor's mortgagee's certification of default.

2. The reason that I am making this certification as opposed to the debtor is that the debtor is and has been hospitalized and she is now unavailable to meet with or even to freely communicate with her counsel.

3. On December 30, 2024, a payment in the amount of \$2,400

was made to the debtor's mortgagee by the debtor's husband on behalf of the debtor. See attached exhibit.

4. For the reasons stated above, I respectfully request that stay relief not be granted.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 3, 2025



Nicholas Fitzgerald
Debtor's Counsel

Exhibit -- Copy of Document Showing Payment of \$2,400.00.

060

ALLWOOD ROAD (439)

415 ALLWOOD ROAD

CLIFTON, NJ, 07012

Cashbox 01

Business Date

DEC 30, 2024

Calendar Date

DEC 30, 2024

Payment

15:13

Transaction Number

79

Account Type

Mortgage/HEIL/HELOC

Account Number

XXXXXX6244

Transaction Amount

\$

2,400.00

Cash Amount

\$

2,400.00

Principal Payment

This deposit or payment is accepted subject to verification and to the rules and regulations of this bank. Deposits may not be available for immediate withdrawal. Receipt should be held until verified with your statement.